



Memo

DATE: *October 29, 2001*

TO: *Distribution*

FROM: *Ron Gill, ES&H Coordinator*

SUBJECT: *Minutes of the EMS Management Review – 10/17/01*

Attendees: Samuel Aronson, Susan Briggs, Barbara Cox, Lori Cunniff, Steve Ferrone, Ronald Gill, Larry Hinchliffe, Steve Shapiro, Joseph Vignola, Michael Zarcone.

Ron Gill gave a presentation for the Physics Department for the EMS Management Review. The presentation was to allow upper management to assess the effectiveness of the program and to evaluate opportunities for improvement.

Questions asked during the presentation were:

- 1) During the Registration Audit, it was found that the system audit requirements were not explicit enough. What was done to satisfy this finding? A statement was added to the Department's Self-assessment Plan and Audit Policy that stated the System Audit would audit all elements of an ISO 14001 system. This finding was corrected on the same day as the audit.
- 2) The FY 2002 plans discuss elimination of the Operation Control forms and implementation of a three-year review cycle of ESRs (1.3.5) for "static" projects. To whom do we defend these changes? Ron Gill will propose these changes to the ES&H committee, and upon agreement would seek concurrence from the BNL ISM/Work Planning Coordinator. Then it would be presented to the Department Chair, Sam Aronson for approval.
- 3) Future issues include a proposal to build and operate a Mercury Jet. How will this impact the Department? This project is part of the target system for the Lab's Muon source project. It will use 150 lbs. of mercury per year, contained in a vacuum system. The use of mercury will be reviewed by the ES&H Committee as part of the ESR process. Recycling the mercury will have to be addressed, and industrial hygiene personnel will be involved to perform hazard and exposure analysis. The building's FUA will be examined to determine if modifications are needed to support this proposed experiment.
- 4) Is Physics meeting the requirements of the previous permit for air emissions? The metal cutting saw, for which the permit is issued, is hardly ever used and the permit requirements are being met. It is the Department's understanding that this saw has been identified as a "trivial source" in the Lab's new Title V permit.

5) Steve Shapiro brought up that the HFBR has mildly radioactive materials, targets and samples, used by Physics researchers, which will be brought over to the Physics building because the HFBR building is closing. This will increase the amount of radioactive materials in the Physics Department. It was asked if these materials would be included in the Department's radioactive sources inventory? It was pointed out that the current inventory includes only sealed radioactive sources. The movement of these sources may require establishing new radiological storage areas and expanding the current radiological inventory to include materials in addition to sealed sources.

6) Are we being successful in changing the safety and environmental culture of Department personnel, and what approaches are we using? Our primary approach is to increase communications and encourage feedback, questions, and even complaints. There is full compliance with Experiment Safety Review requirements. Researchers often contact ES&H Coordinators before beginning, or while planning work to see if additional review is required. Each group appoints a Group Safety Coordinator who acts as a connection between the Department's ES&H staff and workers. They forward relevant information, and keep their group workers and the ES&H staff informed. Tier I inspections have been finding fewer violations than before, and can cover more space in the same amount of time. As a result, the frequency of inspections has been reduced, while still fulfilling our internal inspection requirements.

7) During the last review, there was concern over the Physics FUA containing tenants other than Physics, mainly NSLS. Has this been dealt with? In the short term, Physics and NSLS developed a Memorandum of Understanding (MOU) that detailed each department's responsibilities with respect to Tier I inspections, safety reviews and other obligations. In the longer term, the NSLS tenants are moving out. A similar MOU between Physics and ITD was also developed to address shared space issues.

8) What assessments are planned for this year? From the Significant Aspects list there are six areas that need to be assessed over a three-year period. A Compliance Assessments of hazardous waste management is driven by other requirements. ESD performs certain assessments during the year, and we will take credit for those where possible. Other assessments may be necessary to meet the three-year requirement. An assessment of medical waste management has been suggested for this year. It was suggested that the Environmental Compliance Representative document compliance, using Guidance cards or other means, during the Tier I's to aid in the assessments.

S. Aronson, the Department Chairman, concluded that the EMS program was adequate in scope and effectiveness, and was suited to the needs and operation of the Department. He made no recommendations for policy changes or improvements, and suggested that the EMS maintain its focus on pollution prevention and compliance.

It was noted that Physics has a good Environmental Management System that is well suited to the size of the organization. In addition, Physics has historically had very strong and proactive senior management that was involved and demonstrated to everyone that the EMS and safety issues were taken seriously.

Success stories will be needed this year and one was suggested about the cost avoidance of loaning sources instead of buying new ones.

/cg

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